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Attorneys for Defendants
AMAZON STUDIOS LLC, AMAZON
CONTENT SERVICES LLC, PATRICK
MCKAY, JOHN D. PAYNE, JEFF BEZOS,
AND JENNIFER SALKE

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DEMETRIOUS POLYCHRON, an
individual

Plaintiff,

vs.

JEFF BEZOS, an individual, JENNIFER
SALKE, an individual, SIMON
TOLKIEN, an individual, PATRICK
MCKAY, an individual, JOHN D.
PAYNE, an individual, AMAZON
STUDIOS LLC, a California Limited
Liability Company, AMAZON
CONTENT SERVICES LLC, a Delaware
Limited Liability Company, THE
TOLKIEN ESTATE, THE TOLKIEN
ESTATE LIMITED, THE TOLKIEN
TRUST, and DOES 1-100

Defendants.

Case No. 2:23-cv-02831-SVW-E

**JOINT STIPULATION TO EXTEND
TIME TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS (L.R. 8-3)**

Complaint served: May 4, 2023
Current response date: July 3, 2023
New response date: July 24, 2023

Pursuant to L.R. 8-3, this stipulation is entered by and between plaintiff Demetrious Polychron (“Plaintiff”); defendants Amazon Studios LLC, Amazon Content Services LLC, Patrick McKay, John D. Payne, Jeff Bezos, and Jennifer Salke (the “Amazon Defendants”); and defendants The Tolkien Estate, The Tolkien Estate Limited, The Tolkien Trust, and Simon Tolkien (the “Tolkien Defendants”) (collectively, the “Parties”) with reference to the following facts:

1. Plaintiff filed this action on April 14, 2023.

2. On May 4, 2023, the Amazon Defendants and Tolkien Defendants waived service, making their responses to the initial complaint due on or before July 3, 2023. The Parties agree and stipulate that the Amazon Defendants and Tolkien Defendants shall have until July 24, 2023 to respond to the initial complaint.

3. Plaintiff’s counsel has represented that Plaintiff will file an amended complaint on or before July 7, 2023, to which the Amazon Defendants and Tolkien Defendants consent. Once the amended complaint is filed, the Amazon Defendants and Tolkien Defendants will have fourteen days to respond to the amended complaint, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure.

4. The Parties have not previously requested an extension of time in this matter.

Now, therefore, it is STIPULATED AND AGREED that the Amazon Defendants and Tolkien Defendants shall have until July 24, 2023 to respond to the initial complaint.

DATED: June 29, 2023

KATIE CHARLESTON LAW, PC
KATIE M. CHARLESTON

By: /s/ Katie M. Charleston
Katie M. Charleston

Attorney for Plaintiff
DEMETRIOUS POLYCHRON

1 DATED: June 29, 2023

DAVIS WRIGHT TREMAINE LLP
NICOLAS A. JAMPOL
AMANDA LEVINE
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2
3 By: /s/ Nicolas A. Jampol
4 Nicolas A. Jampol

5 Attorneys for
6 AMAZON DEFENDANTS

7 DATED: June 29, 2023

KLARIS LAW PLLC
LACY H. KOONCE, III
GILI KAREV

8
9 By: /s/ Lacy H. Koonce, III
10 Lacy H. Koonce, III

11 Attorney for
12 TOLKIEN DEFENDANTS

13 **FILER'S ATTESTATION**

14 Pursuant to Central District of California Local Rule 5-4.3(a)(2)(i), I hereby
15 certify that the content of this document is acceptable to all parties in this matter,
16 and I have obtained their authorization to affix their electronic signatures to this
17 document.

18
19 DATED: June 29, 2023

DAVIS WRIGHT TREMAINE LLP

20 By: /s/ Nicolas A. Jampol
21 Nicolas A. Jampol

22 Attorneys for
23 AMAZON DEFENDANTS